

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et al.</i> ,	)	Case No. 01-1139 (JKF)
	)	
Debtors.	)	Jointly Administered
	)	Re: Docket Nos. 12823, 13004, 13130, 12924,
	)	12927, 12929, 12930, 12931, 12944, 12932,
	)	12933, 12934, 12935, 12936, 12937, 12938,
	)	12939, 12940, 12945, 12946, 12947, 12960,
	)	12963, 12970, 12974, 12980, 13067, 13161,
	)	13141, 13142, 13144, 13157, 13158, 13160
	)	9/11/06 Agenda Item No. 2

**CERTIFICATION OF COUNSEL WITH PROPOSED ORDER ON THE DEBTORS'  
MOTION TO COMPEL ASBESTOS PERSONAL INJURY CLAIMANTS TO RESPOND  
TO THE W.R. GRACE ASBESTOS PERSONAL INJURY QUESTIONNAIRE AND  
OBJECTION TO THE DEBTOR'S PROPOSED ORDER**

The Official Committee of Asbestos Personal Injury Claimants ("ACC"), Various Law Firms Representing Asbestos Personal Injury Claimants<sup>1</sup> and the Grace Certain Cancer Claimants (collectively, "Certain Respondents") hereby object to the Debtors' proposed form of order on the Debtors' Motion to Compel Asbestos Personal Injury Claimants to Respond to the W.R. Grace Asbestos Personal Injury Questionnaire as being inconsistent with this Court's rulings at the hearing held on September 11, 2006.

The Debtors first circulated their proposed order on Thursday September 21, 2006 at 5:45 p.m. Despite the short period of time remaining before the September 25, 2006 hearing, the Certain Respondents reviewed the Debtors' proposed order and responded to the Debtors with the attached proposed order, in an attempt to reach agreement on an order that could be

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<sup>1</sup> The Various Law Firms are the following law firms: Baron & Budd, P.C.; Brayton Purcell; Foster & Sear, L.L.P.; Hissey, Kientz & Herron, P.L.L.C.; The Law Offices of Peter G. Angelos, A Professional Corporation; LeBlanc & Waddell, P.C.; David Lipman, P.A.; Chris Parks & Associates; Robert Pierce & Associates; Provost & Umphrey, L.L.P.; Reaud, Morgan & Quinn, L.L.P.; Sieben, Polk, LaVerdiere & Dusich, PA; Silber Pearlman LLP; SimmonsCooper, L.L.C.; Weitz & Luxenberg P.C.; Wilentz, Golman & Spitzer, P.A.; and Williams Bailey Law Firm L.L.P.

submitted to this Court for consideration. Unfortunately, despite two phone calls with Debtors counsel, the Certain Respondents were not able to reach an agreement with the Debtors on the appropriate form of Order. Therefore, the Certain Respondents hereby submit their own proposed order, attached hereto as Exhibit A, which is consistent with the Court's actual rulings at the September 11, 2006 hearing.

Dated: September 22, 2006

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